

# EXHIBIT 9

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Kevin Y. Teruya (Bar No. 235916)  
kevinteruya@quinnemanuel.com  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017-2543  
(213) 443-3000

**HAGENS BERMAN SOBOL SHAPIRO LLP**

Shana E. Scarlett (Bar No. 217895)  
shanas@hbsslaw.com  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
(510) 725-3000

*Interim Co-Lead Consumer Class Counsel*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

This Document Relates To: All Actions

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**CONSUMER PLAINTIFFS' RESPONSES  
AND OBJECTIONS TO DEFENDANT  
META PLATFORMS, INC.'S FOURTH  
SET OF INTERROGATORIES**

1 with the ordinary or customary meaning of such words and phrases or the rules governing the  
2 permissible scope of discovery.

3 16. Consumer Plaintiffs object to the “Instructions” section preceding the Interrogatories  
4 as vague and ambiguous, as well as overly broad, unduly burdensome, and disproportionate to the  
5 extent that they purport to impose an obligation on Consumer Plaintiffs to locate, obtain, and  
6 produce information, documents, and things that are not in the possession, custody, or control of  
7 Consumer Plaintiffs.

### 8 9 **SPECIFIC RESPONSES AND OBJECTIONS**

#### 10 **INTERROGATORY NO. 21:**

11 Identify each “practice[]” You refer to in Your statement in response to Meta’s Request for  
12 Production No. 37 that “Consumer Plaintiffs further object to this Request to the extent it suggests  
13 the liability in this case is tied to certain misrepresentations, rather than the practices Facebook failed  
14 to disclose.”

#### 15 16 **RESPONSE TO INTERROGATORY NO. 21:**

17 Consumer Plaintiffs object to this Interrogatory on the grounds set forth in detail above in  
18 their General Objections. Consumer Plaintiffs further object to this Interrogatory on the grounds  
19 that, by seeking information regarding Consumer Plaintiffs’ prior discovery objections, the  
20 Interrogatory seeks information concerning subject matters that are not relevant to any party’s  
21 claims or defenses in this case, and is unduly oppressive and harassing. Consumer Plaintiffs further  
22 object to this Request on the grounds that it is overbroad, unduly burdensome, and disproportionate  
23 to the needs of the case, including by seeking information regarding Consumer Plaintiffs’ prior  
24 discovery responses and requesting identification of “each” practice Facebook failed to disclose.  
25 Consumer Plaintiffs do not agree to identify every permutation or every instance of substantially  
26 similar practices.

27 Consumer Plaintiffs further object to this Interrogatory on the grounds that it is duplicative,  
28 including of Facebook’s other discovery requests. Consumer Plaintiffs have already provided

1 DATED: March 24, 2023

2 By: /s/ Shana Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**

4 Shana E. Scarlett (Bar No. 217895)

5 shanas@hbsslaw.com

6 715 Hearst Avenue, Suite 202

7 Berkeley, CA 94710

8 (510) 725-3000

9 Steve W. Berman (admitted *pro hac vice*)

10 steve@hbsslaw.com

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 (206) 623-7292

By: /s/ Kevin Teruya

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit

michelleschmit@quinnemanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606

Telephone: (312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

W. Joseph Bruckner (admitted *pro hac vice*)

wjbruckner@locklaw.com

Robert K. Shelquist (admitted *pro hac vice*)

rkshelquist@locklaw.com

Brian D. Clark (admitted *pro hac vice*)

bdclark@locklaw.com

Rebecca A. Peterson (Bar No. 241858)

rapeterson@locklaw.com

Arielle S. Wagner (admitted *pro hac vice*)

aswagner@locklaw.com

Kyle Pozan (admitted *pro hac vice*)

kjpozan@locklaw.com

Laura M. Matson (admitted *pro hac vice*)

lmatson@locklaw.com

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

(612) 339-6900

*Interim Counsel for the Consumer Class*